

# COMPLAINT

(for non-prisoner filers without lawyers)

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN

(Full name of plaintiff(s))

Jeffrey D House

22-cv-00911

v.

Case Number:

(Full name of defendant(s))

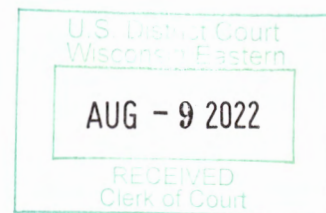
city of Racine Police Dept

(to be supplied by Clerk of Court)

Nicholas Groth, Craig Klepel

Inv. Rasmussen steal Beal

K-9 Odin



### A. PARTIES

1. Plaintiff is a citizen of Wisconsin and resides at  
(State)

1020 11th St Racine WIS 53403

(Address)

(If more than one plaintiff is filing, use another piece of paper.)

2. Defendant Nicholas Groth & et al  
(Name)

is (if a person or private corporation) a citizen of Racine Wisconsin  
(State, if known)

and (if a person) resides at \_\_\_\_\_  
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for city of Racine Police Dept -  
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

**B. STATEMENT OF CLAIM**

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

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The Plaintiff Jeffery House , Alexis Morales

- Vs-

The Defendant's( 1) City of Racine Police Department  
Nicholas Groth , Craig Klepel , Inv.Rasmussen  
Steven Beal , k-9 Odin

The City of Racine Police Department  
Engaged in a pattern of routine and  
Discriminatory and unlawful seizures against plaintiff causing the interference of federally  
protected rights entitled the plaintiff whereas RPD employed individuals whom while acting in  
their official capacity and without provocation cause the unlawful seizure of plaintiff and  
interference of a federally protected right entitled the plaintiff between April 5<sup>th</sup> 2017 and  
September 19<sup>th</sup> 2019

The aforementioned defendants while acting under color of law did so engage conduct not  
limited to warrantless searches in violation of the plaintiff fourth amendment right and  
reasonable expectations of privacy whereas the defendant's also engaged in multiple retaliatory  
routine unlawful seizures against the plaintiff Jeffery house

After the commencement of Plaintiff 2:19cv01307 claim against the City of Racine Police  
Association Vice President Kevin Kupper and secretary Nicholas Groth between April 5<sup>th</sup> 2017  
and September 19<sup>th</sup> 2019 in violation of the Plaintiff 1<sup>st</sup> 4<sup>th</sup> and 14<sup>th</sup> amendment federally  
protected constitutional Right.

- (1) The Defendant Nicholas Groth acting in his official capacity as City of Racine Police Investigator did unlawfully seize the plaintiff Jeffery D House on April 5<sup>th</sup> 2017 following a Terry stop and search of the plaintiff person and property Causing interference of a federally protected right entitled under fourth and fourteenth Amendment of the United States Constitution. The Defendant while acting under color of law in his official capacity of employment as a Racine Police officer , the defendant did maintain his seizure of the plaintiff while lacking probable cause to charge the plaintiff with a crime of possession of firearm and or threatening with firearm folk two failed photo lineups the plaintiff by Officers Jepson whereas civilian eyewitness Steven Vantrese and Kyle Evert had not identified as person responsible of pointing firearm the defendant maintained the an unlawful seizure of the Plaintiff for 7 hours. The Defendant Nicholas Groth did cause the plaintiff to be seized for three days in custody at the Racine County Jail facility.

September 14<sup>th</sup> 2019 Inv. Rasmussen and Inv. Klepel while acting in their official capacity for the city of Racine Police Department police officers klepel forcibly removed cameras affixed to the home before making unlawful entry September 14<sup>th</sup> 2019. Officers Beal accompanied by k-9 Odin made warrantless entry of the plaintiff home room to room in before their forcible removal of plaintiff without arrest warrant.

The Plaintiff was home at 1030 Hilker Place with his girlfriend Alexis Moralez and children prior to RPD officers unlawful warrantless search and seizure and detainment of the plaintiff in his residence the defendant's did cause interfere with a established and federally protected rights entitled to the plaintiff and cause emotional and psychological trauma to the plaintiff whom required medical attention following traumatic encounter with officers Steven Beal his growling k-9 dog police dog Odin , plaintiff was transported into ambulance handcuffed by the defendant's Klepel and Inv. Rasmussen walking around the plaintiff with firearm at the ready did cause the plaintiff anxiety and fear that he would be killed by law enforcement in retaliation for complaints against Racine Police Association Vice President Kevin Kupper and Secretary Nicholas Groth whom the plaintiff was seeking redress against in Eastern District Court the insurmountable toll of panicked cause by intrusion of police into plaintiff residence gave the plaintiff chest pain as he was as he observed from his window plaintiff did Officers Rasmussen with weapon out its holster in threatening fashion. The Plaintiff was later handcuffed and taken from his home . The Plaintiff was taken while detained by RPD the hospital in ambulance injury claim is loss of liberty, emotional distress and humiliation embarrassment to the infringement of plaintiff reasonable expectations of privacy.

This Court has jurisdiction over this case under 28 U.S.C. 1331 and 1343 (a) (3) and (4) since this lawsuit is brought for actions which occurred within the Eastern District of Wisconsin and Plaintiff seeks remedies under the, 4th and 14th Amendments of the U.S. Constitution by 42 U.S.C. 1983 & State pendant Claims under Wis. Stat. 895.46 et. seq.

The plaintiff Jeffrey House is an adult domiciled within the borders of the City and County of Racine. That the City of Racine is a municipality which maintains the Racine Police Department ("RPD ") as its law enforcement branch. City of Racine employs the above named Racine Police Officers as employees or agents That in each of the below described incidents each RPD Officers was personally involved

C. JURISDICTION



I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR



I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ \_\_\_\_\_.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

I am seeking punitive damages in the amount 10,000,000 dollars per defendant named in complaint for personal injury claim and emotional psychological distress —

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 8<sup>th</sup> day of August 2022

Respectfully Submitted,

*Jelley House*

Signature of Plaintiff

262 900-1352

Plaintiff's Telephone Number

housej19966@gmail.com

Plaintiff's Email Address

604 10<sup>th</sup> St

RACINE WI 53403

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper.)

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FILING FEE**



I **DO** request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Filing Fee form and have attached it to the complaint.



I **DO NOT** request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.